

## REMARKS

According to the Communication of September 1, 2005, the reply filed on May 31, 2005 is not fully responsive:

1. For failure to submit a substitute Declaration; and
2. For failure to add headings to the Specification as requested.

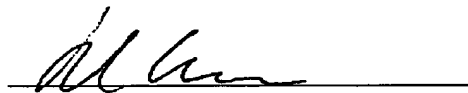
As to 1, a substitute Declaration is being obtained and will be submitted in due course. As obtaining the substitute Declaration entails some difficulty, the Examiner's patience is earnestly requested.

As to headings in the specification, such headings may be suggested but may not be required in an application under 35 USC 371, which the present application is. As expressed in the PTO's analysis of comments received in response to the 1996 Notice of Proposed Rulemaking:

Rule 1.77 merely expresses the Office's preference for the arrangement of the application elements. The Office may advise an applicant that the application does not comply with the format set forth in Rule 1.77, and suggest this format for the applicant's consideration; however, the Office *will not require* any application to comply with the format set forth in Rule 1.77. Therefore, there is no conflict between Rule 1.77 and the PCT. (Emphasis added)

Allowance of claims 1, 3, 4, 6, 7, 9-16 and 18 is respectfully requested.

Respectfully submitted,



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Dated: October 5, 2005